

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**DATE:** AUG 26 2015

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Buckeye Terminals, River Rouge, Michigan

**FROM:** Katharina Bellairs, Environmental Engineer  
AECAB (MI/WI)

**THRU:** Sarah Marshall, Section Chief  
AECAB (MI/WI)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Buckeye Terminals

**Facility Location:** 205 Marion Avenue, River Rouge, Michigan 48218

**Date of Inspection:** October 2, 2014

**Lead Inspector:** Katharina Bellairs, Environmental Engineer, US EPA

**Other Attendees:**

1. Constantinos Loukeris, Environmental Engineer, US EPA
2. Terseer Hemben, DM, Michigan Department of Environmental Quality (MDEQ)
3. Todd Zynda, MDEQ
4. Michael Levin, Terminal Specialist, Buckeye Terminals (Buckeye)
5. J. Brad Crawford, Sr. Operations Manager, Buckeye
6. Chad Butterbush, Apprentice Terminal Operator, Buckeye

**Purpose of Inspection:** Determine Clean Air Act Compliance

**Facility Type:** Tanks Inspection

**Regulations Central to the Inspection:** NSPS Subpart Kb

**Arrival Time:** 9:15 a.m. EST

**Departure Time:** 12:55 a.m. EST

**Inspection Type:**

- ☒ Unannounced Inspection
- ☐ Announced Inspection

**OPENING CONFERENCE**

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

**Process Description:**

We (Katharina Bellairs and Constantinos Loukeris of EPA and Todd Zynda and Terseer Hemben, MDEQ) arrived at Buckeye at 9:15 a.m. and were met by Michael Levin, Terminal Specialist, and J. Brad Crawford, Sr. Operations Manager and Chad Butterbush, Apprentice Terminal Operator. Buckeye operates 24/7 and has 6 employees. Gas and diesel is shipped into the facility via pipeline. The facility has tanks numbered 12 to 23 and 55 to 57. Tanks 12, 17, 18, 22 and 23 are unleaded gasoline, Tank 16 is ethanol, Tank 20 is premium gasoline, Tanks 14 and 21 are out of service, Tank 13 is Number 1 oil, Tank 15 is a mix of gasoline, diesel and transmix, and Tank 57 is number 2 fuel oil. There are is a pressurized number 1 butane tank. Tanks 13 and 57 are fixed roof tanks and all others are internal floating roof tank. Buckeye preforms monthly and annual tank inspections

Currently the facility has a portable vapor combustion unit (VCU) which has been at the facility for two years since a stack test of the facility's previous vapor recovery unit (VRU) showed it was inadequate. Collected vapor goes to a bladder tank, Tank 55, to the VCU. The VRU shuts off if it is not between 1200 degrees F and 1800 degrees F. The vapor combustion unit's minimum temperature is 500 and maximum is 1800. VCU was stack tested between March and May 2014 but it could not test output VOCs. Facility personnel stated they were complying with NESHAP Subpart BBBBBB and were not subject to other MACTs. The facility also has onsite remediation wells that are controlled by air strippers.

**Tour Information:**

**EPA toured the facility:** Yes

**Data Collected and Observations:**

Our tour began at 10:22 a.m. and ended at 12:15 p.m. We gathered the following information:

Tank 18: 153 ppm PID reading on the thief hatch

Tank 17: 1 FLIR video and 1 picture of breather vent

Tank 16: 3 videos, 2 leaks on 2 vents nearest the stairs

Old VRU could not handle the volume

Tank 55: 2 videos, main conservation vent and vacuum breaker, vacuum breaker at 830 ppm

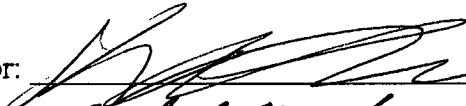
**Field Measurements:** were taken during this inspection.

### CLOSING CONFERENCE

**Concerns:** After the tour, we stated that because Tank 55, the VCU bladder tank, was leaking, not all emissions were being collected and destroyed in the VCU.

### SIGNATURES

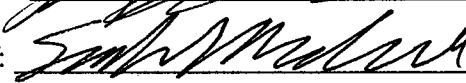
Lead Inspector:



Date:

8/6/15

Section Chief:



Date:

8/6/15

### APPENDICES AND ATTACHMENTS

FLIR Video and Photo Log